

AFFIDVAIT OF ALPESH PATEL

1.

My name is Alpesh Patel. I am more than twenty-one years of age, competent to testify, have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this Affidavit for use in the *A.J. and Q.C. v. MASP, LLC* case pending as Case No. 1:23-cv-04247-JPB in the United States District Court for the Northern District of Georgia, Atlanta Division. This Affidavit was executed in the State of Georgia, County of HENRY, where I am a resident.

2.

I am currently an owner of MASP, LLC, which operates the Days Inn Stockbridge hotel (hereinafter "Days Inn Hotel") located at 7385 Hannover Parkway N., Stockbridge, Georgia 30281.

3.

I was an owner of the Days Inn Hotel in 2013.

4.

In 2013, I worked as the general manager of the Days Inn Hotel.

5.

The Days Inn Hotel generally retains business records for seven years. As a result, the Days Inn Hotel, no longer has any business records from 2013.

6.

As the general manager, all employees, including front desk staff and housekeepers, reported to me.

7.

In 2013, these employees knew to report any issues, crime, or incidents to me as the general manager, and to local police as necessary.

8.

In 2013, no Days Inn Hotel employee reported suspicions of sex trafficking of anyone, including Plaintiffs A.J. and Q.C., happening on the property.

9.

In 2013, I did not observe any signs or evidence of sex trafficking occurring at the Days Inn Hotel during the times that I was at the property.

10.

I have no knowledge of Plaintiffs being trafficked for sex at the Days Inn Hotel in 2013.

In 2013, I was not made aware by any police department or other law enforcement entity or official of any alleged or confirmed instances of sex trafficking occurring at the Days Inn Hotel.

12.

In 2013, I was not made aware by any police department or other law enforcement entity or official of the sting which led to the recovery of Plaintiffs A.J. and Q.C. and arrests of T'Keyah Adams and Craig Hill.

13.

As the general manager of the Days Inn Hotel since at least 2009, I would have been made aware if the Days Inn Hotel was criminally investigated for its alleged facilitation or involvement in a sex trafficking venture. The Days Inn Hotel has never been criminally investigated for its alleged facilitation or involvement in a sex trafficking venture involving Plaintiffs A.J. and Q.C. in 2013.

14.

Over the course of this litigation, I have become aware of an allegation that Plaintiffs were propositioned for sexual acts by someone that they believed to be an employee of the Days Inn Hotel. I was not made aware of any such allegation in 2013. If I had been made aware of any such allegation, an investigation would have been conducted and if the allegations were founded, the individual would have been fired.

15.

If any employee propositioned Plaintiffs or anyone else for sexual acts, such action would be wholly inconsistent with the job duties of any hotel employee and completely outside of course and scope of their employment at Days Inn Hotel.

16.

Thus, I have no knowledge of any of my employees at the Days Inn Hotel facilitating, assisting, or otherwise involved in the sex trafficking of Plaintiff A.J.

17.

Likewise, I have no knowledge of any of my employees at the Days Inn Hotel facilitating, assisting, or otherwise involved in the sex trafficking of Plaintiff Q.C.

Executed on 11-8-24



Alpesh Patel

